

# ORIGINAL

1 Wu.5k1.1

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FILED  
DISTRICT COURT OF GUAM  
FEB - 7 2006  
MARY L.M. MORAN  
CLERK OF COURT

7 Attorneys for United States of America

8 **IN THE UNITED STATES DISTRICT COURT**  
9 **FOR THE DISTRICT OF GUAM**

10 UNITED STATES OF AMERICA, ) CRIMINAL CASE NO. 05-00063  
11 Plaintiff, )  
12 vs. ) GOVERNMENT'S MOTION  
13 ) FOR A DOWNWARD DEPARTURE  
14 PI-JU WU, ) UNDER USSG § 5K1.1 AND  
15 Defendant. ) 18 U.S.C. § 3553(e)  
16 \_\_\_\_\_)

17 Comes now the United States and moves, pursuant to USSG § 5K1.1 and 18 U.S.C.  
18 § 3553(e), for a substantial assistance downward departure from Offense Level 10 to Level 9, an  
19 advisory guideline range of 4 to 10 months. The government intends to recommend a sentence  
20 of time served.

21 RESPECTFULLY SUBMITTED this 7<sup>th</sup> day of February, 2005.

22 LEONARDO M. RAPADAS  
23 United States Attorney  
24 Districts of Guam and NMI

25 By:

26 JEFFREY J. STRAND  
27 Assistant U.S. Attorney  
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